

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
Plaintiff,)	Honorable Aleta A. Trauger
vs.)	DECLARATION OF CHRISTOPHER M.
CORRECTIONS CORPORATION OF)	WOOD IN SUPPORT OF PLAINTIFF'S
AMERICA, et al.,)	MOTION FOR DISCOVERY SANCTIONS
Defendants.)	
_____)	

I, Christopher M. Wood, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Tennessee and this Court. I am a member of the law firm Robbins Geller Rudman & Dowd LLP, Lead Counsel for Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund, and the Class in the above-captioned action. This Declaration is made in support of Plaintiff's Motion for Discovery Sanctions. I have personal knowledge of the matters stated herein, and, if called upon, I could and would competently testify thereto.

2. Attached hereto is a true and correct copy of each of the following exhibits:

- Exhibit 1: Letter from Faraz R. Mohammadi, counsel for Defendants, to Christopher M. Wood, counsel for Plaintiff, dated November 28, 2018;
- Exhibit 2: Letter from Kenneth J. Black, counsel for Plaintiff, to counsel for Defendants, dated January 28, 2020 [**FILED UNDER SEAL**]; and
- Exhibit 3: Request for Additional Information from the Special Master, Hon. Faith S. Hochberg (ret.), to Defendants, dated September 2, 2020.

I declare under penalty of perjury under the laws of the State of Tennessee that the foregoing is true and correct. Executed this 6th day of October, 2020, at Nashville, Tennessee.

s/ Christopher M. Wood
CHRISTOPHER M. WOOD

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 6, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood

CHRISTOPHER M. WOOD

ROBBINS GELLER RUDMAN
& DOWD LLP

414 Union Street, Suite 900

Nashville, TN 37219

Telephone: 800/449-4900

615/252-3798 (fax)

E-mail: cwood@rgrdlaw.com

Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Kenneth J. Black**
kennyb@rgrdlaw.com
- **Paul Kent Bramlett**
pknashlaw@aol.com
- **Robert P. Bramlett**
robert@bramlettlawoffices.com
- **Christopher T. Cain**
cain@scottandcain.com, ambrose@scottandcain.com
- **Patrick V. Dahlstrom**
pdahlstrom@pomlaw.com
- **Jason A. Forge**
jforge@rgrdlaw.com
- **Brian T. Glennon**
brian.glennon@lw.com
- **Michael Goldberg**
michael@goldberglawpc.com
- **Marc Gorrie**
mgorrie@pomlaw.com
- **Meryn C.N. Grant**
Meryn.Grant@lw.com
- **Dennis J. Herman**
dherman@rgrdlaw.com, e_file_sd@rgrdlaw.com
- **James A. Holifield , Jr**
aholifield@holifieldlaw.com
- **J. Alexander Hood , II**
ahood@pomlaw.com
- **Jeremy A. Lieberman**
jalieberman@pomlaw.com, disaacson@pomlaw.com, lpvega@pomlaw.com
- **Christopher Hamp Lyons**
clyons@rgrdlaw.com, KennyB@rgrdlaw.com, e_file_sd@rgrdlaw.com
- **Jerry E. Martin**
jmartin@barrettjohnston.com, adonovan@barrettjohnston.com, eseaborn@barrettjohnston.com, jmartin@rgrdlaw.com
- **Milton S. McGee , III**
tmcgee@rwjplc.com, dgibby@rwjplc.com
- **Faraz Mohammadi**
faraz.mohammadi@lw.com
- **Willow E. Radcliffe**
willowr@rgrdlaw.com, WillowR@ecf.courtdrive.com
- **Steven Allen Riley**
sriley@rwjplc.com, dgibby@rwjplc.com
- **Brian Schall**
brian@goldberglawpc.com
- **David J. Schindler**
david.schindler@lw.com
- **Sarah A. Tomkowiak**
sarah.tomkowiak@lw.com

- **Morgan E. Whitworth**
morgan.whitworth@lw.com,morgan-whitworth-8044@ecf.pacerpro.com
- **Christopher M. Wood**
cwood@rgrdlaw.com,smorris@rgrdlaw.com,CWood@ecf.courtdrive.com,willowr@rgrdlaw.com,e_file_sd@rgrdlaw.com,smorris@ecf.courtdrive.com

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- (No manual recipients)